certify P453314772

SHELLER-GLOBE

October 16, 1986

Mr. Michael J. Sanderson
Chief, RCRA Branch
U.S. Environmental Protection Agency
726 Minnesota Avenue
Kansas City, KS 66101

Dear Mr. Sanderson:

This letter is in reference to the status of the hazardous waste storage permit at our manufacturing facility located in Keokuk, Iowa. The Sheller-Globe Corporation, due to a recent merger, does not qualify for use of the financial test to demonstrate financial responsibility for liability coverage of hazardous waste stored at our manufacturing facilities. We have been unsuccessful in obtaining environmental liability insurance coverage from a private insurance company. Since we are unable to obtain the required liability coverage, we are downgrading our hazardous waste storage activity for facilities which had interim status approval to store for more than 90 days to generator status with storage for less than 90 days.

Our manufacturing plant located in Keokuk, Iowa, has approved interim status to store hazardous waste drums for more than 90 days. The EPA I.D.# for this facility is IAD005136023.

We are enclosing a Closure Plan for this facility for your Agency's review and approval. Upon your Agency approval, this Closure Plan will be implemented immediately.

We are presently arranging removal and disposal of all accumulated hazardous waste at this facility. After the accumulated hazardous waste has been removed, this facility will mark all hazardous waste containers with the appropriate date of generation. All hazardous waste will be removed and disposed of within 90 days of generation. We will inform your Agency as soon as we remove all accumulated hazardous waste at this facility and are storing hazardous waste less than 90 days.

Corporate Technical Center 4444 N. Detroit Avenue Caller No. 64009 Toledo, OH 43612 419/476-8901

If you have any questions or need additional information concerning the enclosed Closure Plan or this letter, please contact myself or Jeffery Bruestle at this office.

Sincerely,

SHELLER-GLOBE CORPORATION

Gregory D. Sautter
Manager of Environmental Activities

GDS/mem

Enclosure

cc: R. Ransford
J. Bruestle
Iowa Department of Water, Air and Waste Management
Henry A. Wallace Building
900 East Grand
Des Moines, Iowa 50319

SHELLER-GLOBE CORPORATION
KEOKUK PLANT
CLOSURE AND POST CLOSURE PLAN

The following plan shall be implemented when this facility downgrades its hazardous waste storage activity from more than 90 days to less than 90 days.

A. GENERAL INFORMATION

The Sheller-Globe Plant in Keokuk, Iowa, is used to make extruded and molded rubber weatherstripping and molded polyurethane dashboards for automotive applications.

Flammable waste solvents from cleaning and painting operations are placed in 55-gallon drums and stored in an outside hazardous waste storage area.

Non-flammable wastes including chlorinated solvents, isocyanates and urethane polyols are stored in an outside storage area in 55-gallon drums.

The facility is surrounded by manufacturing, agricultural, and residential areas. It is located near the northern edge of the city limits of Keokuk which has a population of 10,000 persons.

The plant is located at: 3200 Main Street
Keokuk, Iowa 52632

EPA ID#: IAD 005136023

The hazardous waste storage areas are located within a fenced area. Access to the plant is limited to authorized personnel or guests escorted by authorized personnel during working hours. Off-hours and week-ends the facility is locked up and patrolled by security personnel.

B. ESTIMATE OF THE YEAR OF CLOSURE

1. While the main activity of this facility is manufacturing, hazardous wastes generated by on-site operations are stored on-site for more than 90 days.

2. The closure plan will be submitted to the US EPA Regional Administrator and the Iowa Department of Air, Water and Waste Management prior to implementation of the closure plan.

C. INVENTORY

1. The maximum inventory at this facility of hazardous waste in storage at any given time prior to closure is:

Drum storage isocyanate	50 drums
Drum storage flammable solvent	70 drums
Drum storage chlorinated solvent	70 drums
Drum storage liquid hazardous waste, n.o.s.	10 drums

2. In addition to the hazardous waste in the storage area prior to closure, other types of hazardous wastes may be generated by the closure. They would include wastewater used to decontaminate the storage area.

   a. Drum storage of waste wash 3 drums

   All solvents will be sent to a reclamation facility if possible. Waste which cannot be reclaimed or reused will be sent to an approved hazardous waste disposal facility.

D. CLOSURE ACTIVITIES

The following are the steps taken to close and decontaminate the hazardous waste storage areas at the plant in Keokuk. These closure activities will be initiated immediately upon receipt of the final approval of this Closure Plan.

1. Site Description

   There are two areas (see Figure A) in which hazardous wastes have been or are presently stored at the plant.

   a. Site #1 is in front of the flammable liquid and mix storage building located behind the plant. The area has storage capacity for approximately 200-300 drums of hazardous waste. The storage area is asphalted and is bordered by grass on the south and west sides. The use of this site for hazardous waste storage was discontinued.

   b. Site #2 is behind (west) the flammable liquid mix and storage building. This storage area is presently being used to store hazardous waste. This storage area is asphalted and is bordered by grass on the south and west side.

2. Description of Closure

   a. All hazardous waste in storage shall be inventoried and inspected for proper packaging, identification and labeling. Any hazardous waste not properly packaged or labeled shall be segregated.

   b. All waste material in the storage area shall be consolidated by placing compatible material in proper drums, i.e., non-halogenated solvent with non-halogenated solvent, etc.

   c. All waste drums in the storage area shall be marked, labeled and inventoried in accordance to their content.

   d. Below is a list of the facilities which may be used to recycle and/or dispose of waste generated by this closure:

      1) Peoria Disposal Co. ID# ILD000805812
      2) Ross Incineration Services, Inc. ID# OHD048415665
      3) Waste Research & Reclamation Co. ID# WID990829475

e. After the removal of all hazardous waste from the drum storage areas, the location will be inspected for spillage and contaminated soil. The following is the decontamination procedure to be conducted on the drum storage areas:

DECONTAMINATION PROCEDURE

Drum Storage Areas

When the drums have been removed from Storage Site #1 and all hazardous waste drums have been removed from the drum storage area (Site #2), these locations will first be visually inspected for spillage and for soil contamination in the areas adjacent to the storage areas. If any spillage or residue is evident, they will be removed by scraping or chiseling. All scrapings will be swept up, placed in appropriate containers and handled as a hazardous waste. The storage area floor will then be washed with a detergent solution and rinsed with clean water. All wash and rinse water will be collected and placed into 55-gallon drums. A sample of wastewater will be analyzed for volatile organics by U.S. EPA Method 824 and 825. When the analytical results are received and reviewed, the disposal of this wastewater will be either into the sanitary sewer or handled as a hazardous waste.

After removal of the visually evident spillage, the soil in the area adjacent to the drum storage area will be sampled with 6" deep soil core samples at ten foot intervals, one foot from the edge of the outside concrete storage areas. One background soil sample will be taken and analyzed to determine basis for contamination.

These soil core samples will be analyzed for volatile organics by U.S. EPA Method 824 and 825 from The Test Methods for Evaluating Solid Wastes, 1980. If contamination is confirmed, the soil will be removed and the same sampling procedure repeated until samples confirm non-contamination. All contaminated soil will be disposed of at an approved location, listed in Section D (2).

Disposal of soil in contaminated area. Although the soil is not expected to be contaminated by the drum storage at Keokuk, an allowance has been made in the closure costs for removal and disposal of approximately 80 yd^3. It is assumed that 1 yd^3 of soil will weigh approximately 1 ton.

h. Closure of the hazardous waste storage area of this facility should be completed within 180 days after the approval of the closure plan. (See the attached anticipated closure schedule, Item 1.)

i. During closure, a qualified independent registered professional engineer shall inspect this facility on the time periods during closure listed below:

Implementation of closure
Implementation of decontamination procedure
Implementation of soil sampling
Completion of closure

If the facility has not been closed in accordance with the specifications of this closure plan, corrective measures shall be instituted. If the facility has been closed properly, a certification of that fact shall be submitted by Sheller-Globe Corporation, and the independent registered professional engineer to U. S. Environmental Protection Agency Region VII Administrator and the Iowa Department of Air, Water and Waste Management.

j. Upon completion and certification of closure, all records, tests, permits, manifests, etc., concerning the generation, handling and storage of hazardous waste at this facility shall be kept at their facility until the final closure of this facility is implemented at which time all records will be forwarded to the Corporate Manager of Environmental Control and stored in appropriate files. Location of these at that time files will be forwarded to the appropriate regulatory agencies.

D. POST CLOSURE

Post Closure care is not applicable since hazardous wastes generated on this site were only temporarily stored at this facility. All hazardous waste on site will be removed for permanent disposal according to RCRA regulations. The hazardous waste storage area will be decontaminated.

E. INCOMPATIBLE WASTES

Incompatible wastes are stored in the inside drum storage area. One waste, isocyanate, which is considered a hazardous waste, is stored in the hazardous waste drum storage area. The other waste, polyol, which is also considered non-hazardous, is stored in the non-hazardous drum storage area. These two waste materials are separated from each other by a dike or trench.

All ignitable wastes are stored in the hazardous waste area which is a no smoking area and is located more than 50' from our property line.

F. EQUIPMENT AND MATERIAL AVAILABLE AT THE KEOKUK PLANT

Fork trucks - 2
Empty 55/gallon drums - 100
Personnel safety equipment such as rubber gloves, boots, head protection, respirators, solvent resistant coveralls, etc.
Pumps - solvent resistant
Rinsing solvent - acetone, 500 gallons or isopropyl alcohol
Absorbent material
Hazardous waste labels
Personnel - to implement closure plan

G. EQUIPMENT AND MATERIAL FROM OTHER SOURCES

Laboratory support - A & L Midwest Laboratory, Omaha, Nebraska
Soil removal equipment, backhoe, etc. - Rose Brothers, Keokuk, Iowa
Hazardous waste storage containers - Chemical Waste Management

G. COST ESTIMATE FOR CLOSURE

Labor*

a. Equipment decontamination (40 hr x $25/hr)	$1,000
b. Consolidation and identification of hazardous waste drums (80 hr x $25/hr)	2,000
c. Storage area decontamination (80 hr x $50/hr)	4,000
d. Sampling and loading drums (40 hr x $25/hr)	1,000
	$8,000

Equipment and Outside Services

a. Soil core sampling (15 samples x $50/sample)	$ 750
b. Soil core analyses (15 samples x $500/sample)	7,500
c. Laboratory testing (40 samples x $100/sample)	4,000
d. Expendable - gloves, boots, coveralls, drums, absorbent, etc.	10,000
e. Backhoe (if required) (10 hr x $60/hr)	600
f. Washing solvent (10 drums x $140/drum)	1,400
g. Drum transportation (4 truckloads x $600/trip)	2,400
	$26,650

Disposal

a. Waste flammable liquids (70 drums x $100/drum)	$ 7,000
b. Waste chlorinated solvent (70 drums x $100/drum)	7,000
c. Waste Isocyanate (50 drums x $200/drum)	10,000
d. Miscellaneous hazardous waste (10 drums x $200/drum)	2,000
e. Contaminated soils (if required) (80 yd^3 x $60/$yd^3$)	4,800
	$30,800

Certification of Closure

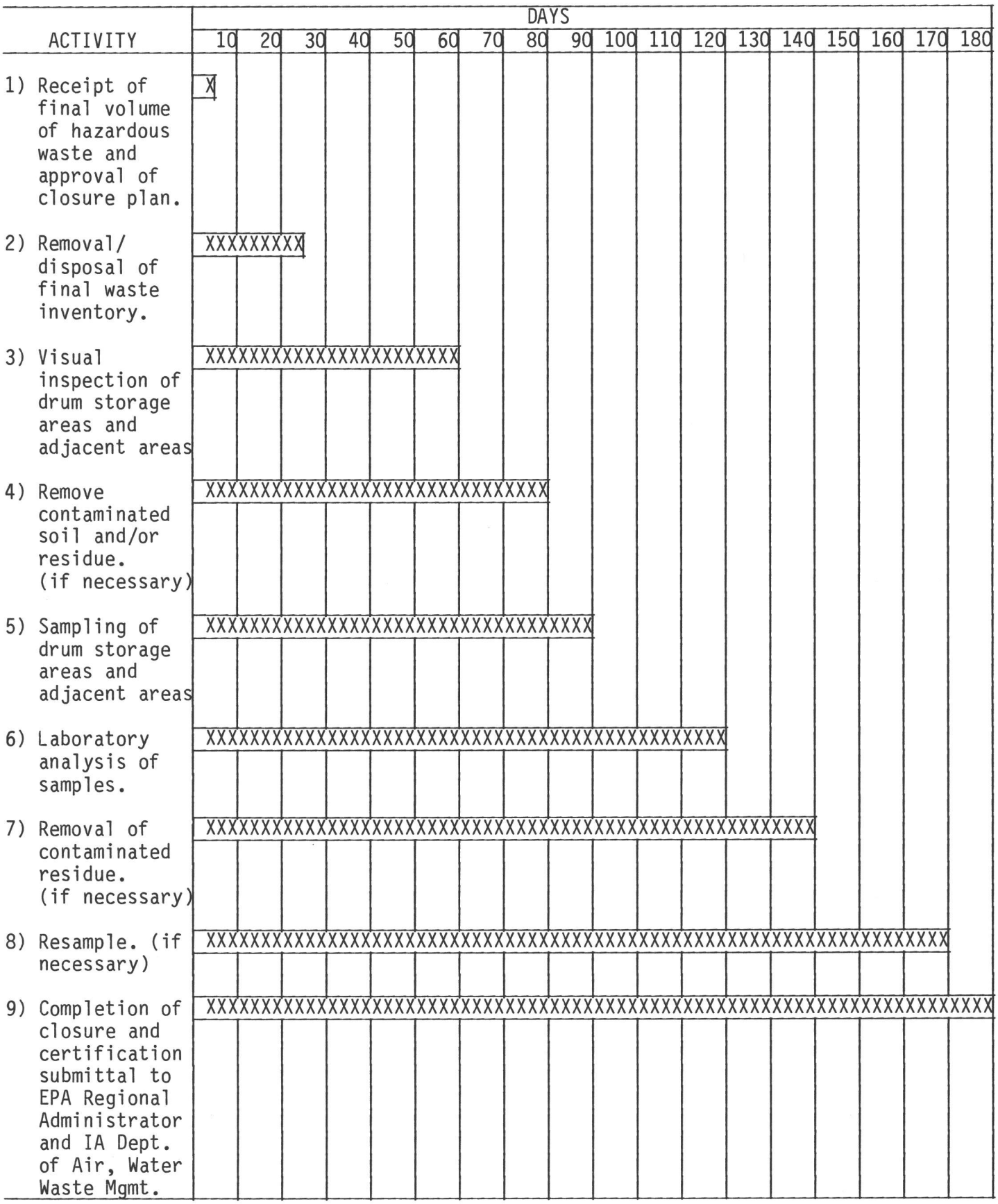
a. Cost of professional engineer and certification (10 days x $400/day)	$ 4,000
SUBTOTAL COST -	$69,450
Contingency for additional sampling labor, disposal, equipment, etc. 15% of subtotal cost	$10,400
TOTAL ESTIMATED CLOSURE COST (1986) -	$79,850

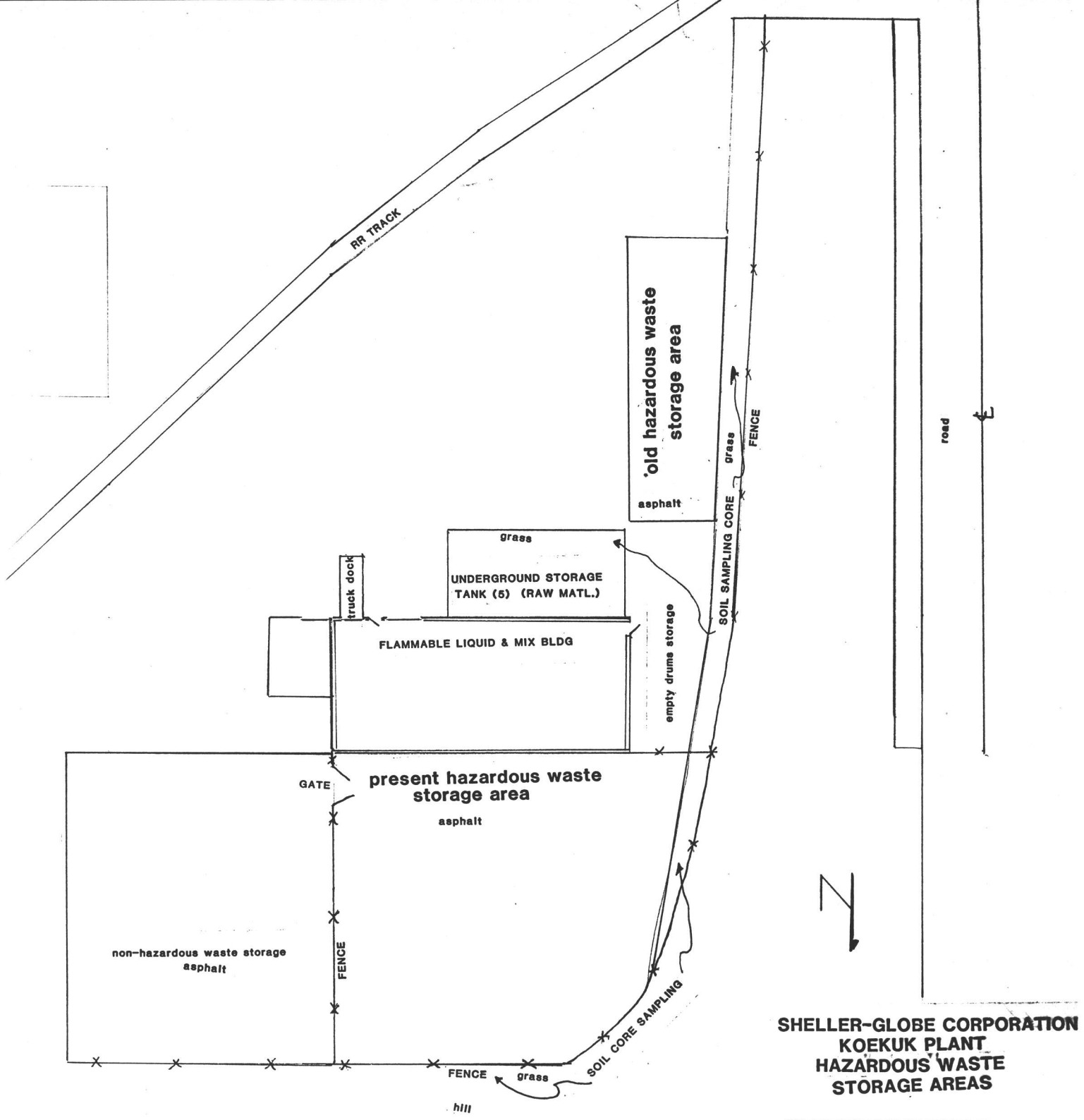
*Labor cost reflects the use of outside contractors. Normally, we would use our own employees for closure.

ITEM 1

ANTICIPATED CLOSURE SCHEDULE

Sheller-Globe Corporation - Keokuk Plant





SHELLER-GLOBE CORPORATION
KOEKUK PLANT
HAZARDOUS WASTE STORAGE AREAS

DATE: 10/15/86